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March 31, 2020

VIA ECF

The Honorable Paul A. Engelmayer, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1305
New York, New York 10007

Re: Jacquelyn Musiello v. CBS Corporation et al., 20-CV-02569 (PAE) (JLC)

Dear Your Honor:

We represent Defendants Entercom Communications Corp. (“Entercom”), CBS Corporation n/k/a ViacomCBS Inc. (for ease of reference only, “CBS”), CBS Radio Inc. n/k/a Entercom Media Corp. (for ease of reference only, “CBS Radio”), CBS Sports Radio Network Inc. n/k/a Entercom Sports Radio, LLC (for ease of reference only, “CBS Sports Radio”), and Margaret Marion (collectively “Defendants”) in the above-referenced action. We write Pursuant to Rule I(e) of Your Honor’s Individual Practices Rules, with Plaintiff’s consent, to respectfully request an extension of time for Defendants to answer, move or otherwise respond to Plaintiff’s Complaint from April 1, 2020 to April 30, 2020.

This action was originally filed in the Supreme Court for the State of New York, Bronx County, on February 14, 2020 (and a “corrected” Complaint was filed on February 18, 2020). On March 25, 2020, Defendants filed a Notice of Removal in this Court pursuant to the Class Action Fairness Act, 28 U.S.C. § 1332(d). *See* Dkt. Nos. 1-4. Pursuant to Federal Rule of Civil Procedure 81, Defendants’ deadline to respond to the Complaint is currently April 1, 2020. In light of the COVID-19 global health pandemic, Defendants are limited in their access to relevant documents, information, and witnesses and, given these constraints, the requested extension is necessary to allow Defendants additional time to investigate Plaintiff’s allegations and claims and thus prepare their response to the Complaint.

This is Defendants’ first request for an extension of time to respond to Plaintiff’s Complaint. As noted above, Plaintiff consents to the requested extension. The requested extension will not affect any other deadlines in this matter.

Thank you for Your Honor’s time and consideration.

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Hon. Paul A. Engelmayer, U.S.D.J.
March 31, 2020
Page 2

Dated: March 31, 2020
New York, New York

Respectfully submitted,
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Attorneys for Defendants CBS Corporation, CBS Radio Inc., CBS Sports Radio Network Inc., Entercom Communications Corp., and Margaret Marion

cc: Donna H. Clancy, Esq., *Counsel for Plaintiff* (by e-mail)

Granted. Defendants' time to answer or otherwise respond to
the Complaint is extended *nunc pro tunc* from April 1, 2020 to
April 30, 2020. SO ORDERED.


PAUL A. ENGELMAYER 4/2/2020
United States District Judge